

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PACIFIC CENTURY)	
INTERNATIONAL, LTD.,)	CASE NO.
)	
Plaintiff,)	
)	Judge:
v.)	Magistrate:
)	
JOHN DOE,)	[Case pending in the U.S. District Court
)	for the Eastern District of California,
Defendant.)	No.2:11-CV-03479]
)	

PLAINTIFF'S MOTION TO COMPEL COMPLIANCE WITH SUBPOENA

Plaintiff PACIFIC CENTURY INTERNATIONAL, LTD. respectfully moves this Court, pursuant to Federal Rules of Civil Procedure Rule 45(c)(2)(B), to enter an Order directing CEQUEL III COMMUNICATIONS II, LLC d/b/a SUDDENLINK COMMUNICATIONS ("Suddenlink") to comply with the subpoena *duces tecum* issued January 20, 2012, and to produce documents or information described therein in the matter captioned above and pending in the U.S. District Court for the Eastern District of California. Plaintiff seeks to obtain identifying information associated with internet service account subscribers including name, current (and permanent) address, telephone number, e-mail address, and Media Access Control address pursuant to lawful subpoenas issued to Suddenlink and served on January 24, 2012.

Pursuant to Local Rule 37.2, after consultation by telephone and good faith attempts to resolve differences, the parties resolved one objection by Suddenlink. The undersigned counsel for Pacific Century International, Ltd. and John D. Seiver, counsel for Suddenlink held a telephone consultation on February 13, 2012 at or around 3:00 p.m. Good faith attempts by the

parties were able to resolve one of the objections raised by Suddenlink, but the parties were unable to reach an accord on the remaining objections.

WHEREFORE, Plaintiff respectfully requests an order compelling Suddenlink to comply with the subpoena.

Respectfully submitted,

PACIFIC CENTURY INTERNATIONAL, LTD.

DATED: February 15, 2012

By: /s/ Paul Duffy
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on February 15, 2012, copies of the foregoing document were served via First Class Mail, Postage Paid to:

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Attorney for Cequel III Communications II, LLC d/b/a Suddenlink Communications

By: /s/ Paul Duffy
Paul Duffy